



Americell PA3, LP d.b.a Indigo Wireless  
499 Filer ID 815618  
64 Main St.  
Wellsboro, PA 16901

**EB DOCKET NO. 06-36**

**Exhibit A: 47 C.F.R. 64.2009 Compliance Certificate Accompanying Statement  
Reporting for 2017**

The following summary describes the policies of Americell PA3, LP, d.b.a Indigo Wireless ("Company") that are designed to ensure compliance with the Federal Communication Commission regulations regarding the protection of customer proprietary network information ("CPNI").

- A. Company re-educates its employees annually with a training seminar regarding the appropriate use of CPNI and trains all employees on the importance of confidentiality of customer information. New employees are trained and must read and acknowledge Company policy before accessing CPNI. Company has established disciplinary procedures should an employee violate the CPNI procedures established which can include termination of employment. All employees are required to sign a document stating they understand the CPNI state and federal laws and the policies of the Company. Company has developed a company culture in which CPNI will be protected as a high priority.
- B. Only CPNI policy-trained employees are allowed to access CPNI or disclose CPNI information to the customer of record. Company has established procedures to verify an incoming callers' identity. Authentication of customer over the phone for non-call data will require social security number (last 4 digits) and three other uniquely identifying pieces of information to ensure the company is discussing the account with the authorized account holder.
- C. Authentication of customer over the phone for call data will require customer to supply exact call information, information can be mailed to the customer address of record, or call back to phone number of account.
- D. Authentication of customer at retail locations will require a government issued photo identification matching the customers account information.
- E. In 2017, the Company did offer online access to customer information. The Company does allow customers to access their accounts and billing information online. The Company does take measures to secure the customer information with proper authentication, including the use of a username, passwords, unique security questions, and other methods that comply with FCC rules to protect CPNI.

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- F. The Company will notify the customer immediately if the customer's address of record is changed. This notification is made by mail or email to the customer's pre-existing address of record, and does not reveal the changed information.
- G. Company does not use CPNI for marketing and we do not share CPNI with third parties (except for billing and collections services). Current policy requires supervisors to deny all requests for CPNI use for marketing purposes. Company will not use CPNI without prior customer consent to market vertical services and or products.
- H. Company maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI for two years.
- I. A "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI. As soon as practicable, and in no event later than seven (7) business days upon learning of a breach, the Company shall electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) by accessing the following link: <https://www.cpnireporting.gov>. Company will not notify customers or disclose a breach to the public until 7 full business days have passed after notification to the USSS and the FBI except as provided below. If Company receives no response from law enforcement after the 7th full business day, it must promptly proceed to inform the customers whose CPNI was disclosed of the breach. Company will delay notification to customers or the public upon request of the FBI or USSS.
- J. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or the customer provides written permission.
- K. Company maintains a record of all customer complaints related to its handling of CPNI, and records of Company's handling of such complaints, for at least two years. Any complaints would be reported and reviewed to determine whether any changes to this policy are appropriate and to address the concerns raised by such complaints. Company did not receive any customer complaints in 2017 in regards to CPNI.
- L. Company did not take any action against Data Brokers in 2017.